

June 15, 2007

Winston Hickox, Chair
Cal/EPA Market Advisory Committee
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Market Advisory Committee Draft Recommendations on Carbon Cap-and-Trade

Dear Chair Hickox:

The Global Recycling Council is a Technical Council of the CA Resource Recovery Association (see www.CRRA.com). The Global Recycling Council was organized to promote the adopted CRRA Agenda for the New Millennium (<http://www.crra.com/legislation/newmill.html>). That Agenda calls for the adoption of Zero Waste policies that would end welfare for wasting, conserve resources, create far more jobs than landfilling and build communities.

We are writing in support of the letter submitted by Californians Against Waste (CAW). In particular, we oppose offsets being provided for landfill gas capture as that activity should clearly just be regulated. Providing offsets would just provide an additional economic incentive to landfill our valuable resources.

In California we have over 15 years of experience with a similar public policy - allowing the use of Alternative Daily Cover (ADC) to count towards the 50% waste diversion goal set by the State in AB939. In large part due to the adoption of this policy by the Legislature in the early 1990s, an insufficient number of composting facilities were built because they couldn't compete with the low-cost production of ADC. Detailed analyses have been done about this public policy that demonstrate the impact that policies such as the offsets proposed for landfill gas capture could have on the industry.

The recycling industry has been documented to be as large as the automobile manufacturing industry in America (see <http://www.epa.gov/jtr/econ/rei-rw/rei-rw.htm>). State policy (AB939) encourages the expansion of reuse, recycling and composting programs. More energy is conserved by reuse and recycling than is produced from any landfill gas to energy system. Instead of supporting competing technologies like landfilling, the final MAC report should support offsets for reducing waste, reuse, recycling and composting.

Sincerely,

Laura Anthony
Chair
Global Recycling Council

Note: The views expressed above by the Global Recycling Council do not necessarily reflect the views of the CRRA, CRRA members or other CRRA Technical Councils.